

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RAYMOND SNOWDEN,)	
)	
Plaintiff,)	1:18-cv-03691
)	
v.)	
)	
DE VILLE ASSET MANAGEMENT, LTD.,)	
)	
Defendant.)	

NOTICE OF RECEIVERSHIP AND MOTION TO STAY PROCEEDINGS

PLEASE TAKE NOTICE that on September 13, 2018, an Order Appointing Temporary Receiver (Doc. No. 11) (the “Receivership Order”) was entered in the case styled *Securities and Exchange Commission v. Kevin B. Merrill, et al.*, Cause No. 1:18-cv-02844-RDB pending in the United States District Court for the District of Maryland (the “Receivership Action”). A true and correct copy of the Receivership Order is attached as **Exhibit A** and incorporated herein by reference. Pursuant to the Receivership Order, a stay has been entered with respect to “[a]ll civil legal proceedings of any nature . . . involving: . . . (c) any of the Receivership Parties,¹ including subsidiaries and partnerships (such proceedings are hereinafter referred to as ‘Ancillary Proceedings’).” Receivership Order at ¶ 34. “All Ancillary Proceedings are stayed in their entirety, and all Courts having any jurisdiction thereof are enjoined from taking or permitting

¹ The “Receivership Parties” are defined as: Kevin B. Merrill, Jay B. Ledford; Cameron R. Jezierski; Global Credit Recovery, LLC; Delmarva Capital, LLC; Rhino Capital Holdings, LLC; Rhino Capital Group, LLC; DeVille Asset Management LTD; Riverwalk Financial Corporation; K.B. Merrill Associates; Financial Reclamation Group LLC; Halo Credit Solutions LLC; JBL Holdings LLC; Jay B. Ledford, P.C.; the Joseph Finance Company; Leddy Bear LTD; Ledford & Associates, PLLC; King Fischer LTD d/b/a LP Investments LTD; NLEX, Inc.; Receivables Portfolio Interchange, Inc.; Riverwalk Capital Investments, Inc.; Riverwalk Credit Solutions, Inc.; Riverwalk Debt Solutions, Inc.; Riverwalk Fixed Asset Group LLC; SCUSA Financial, Inc.; Vaquero Asset Management, Inc.; CRJ Holdings LLC; Centurion Capital Corporation; GCR CBL CP I, LLC; GCR CBL CP II, LLC; GCR CBL CP III, LLC; GCR CBL CP IV, LLC; GCR HCP Holdings 1, LLC; and GCR Mercer Holdings, LLC. Receivership Order at ¶ 1.

any action until further Order of [the] Court” in the Receivership Action. Receivership Order at ¶ 36.

Defendant, DEVILLE ASSET MANAGEMENT, LTD. is a named party in this action. Accordingly, DEVILLE ASSET MANAGEMENT, LTD., moves the Court to stay the prosecution of this action consistent with the Receivership Order until further order of the Court in the Receivership Action, and award all other just and proper relief in the premises.

Dated: November 6, 2018

Respectfully submitted,

/s/ Kevin C. Rasp
Kevin C. Rasp (ARDN No. 6297481)
O'Hagan Meyer LLC
One East Wacker Drive
Suite 3400
Chicago, Illinois 60601
(312) 422-6100
(312) 422-6110
krasp@ohaganmeyer.com

Attorney for DeVille Asset Management, Ltd.

CERTIFICATE OF SERVICE

I hereby certify that, on November 6, 2018, I filed the foregoing with the Court using the Clerk of Court's CM/ECF system, which will send electronic notice to all counsel of record:

David M. Marco
SMITH MARCO P.C.
55 W. Monroe Street, Suite 1200
Chicago, IL 60603
312.546.6539
Attorney for Plaintiff

/s/ Kevin C. Rasp
Attorney for DeVille Asset Management, Ltd.